From:	Sales, James
To:	Moore, Gary
Subject:	RE: FJ Doyle Site
Date:	Wednesday, March 28, 2018 1:59:15 PM

You would want to verify that there is no pathway for any contamination above 1 ppm to migrate offsite—i.e., no groundwater and that any precipitation infiltration would not cause the pcbs to move. You would also need to deed restrict the property to not allow residential development.

From: Moore, Gary
Sent: Wednesday, March 28, 2018 12:47 PM
To: Sales, James <sales.james@epa.gov>
Subject: RE: FJ Doyle Site

James:

We will typically go down 2 feet (maximum). If contamination is below that level above 1 mg/kg we would leave it and put a marker in the ground which is usually orange plastic fence fabric.

Does this sound reasonable? We may make them put a notation in the deed.

Thanks
Gary Moore

From: Sales, James
Sent: Wednesday, March 28, 2018 11:04 AM
To: Moore, Gary <Moore.Gary@epa.gov>
Subject: RE: FJ Doyle Site

The Doyle site does need to be cleaned up, but I understand that dan doyle doesn't have the money to complete it.

TSCA has no restriction on maximum depth. It only requires an accurate characterization of the pcb contamination at the site under subpart N. PCB contamination in clay soil
Is typically down to the first 6 to 12 inches, but can go much deeper if there is a pathway such as sandy soils, high g.w., or soils next to building foundations. At the doyle site, I would expect contamination down to a foot.

From: Moore, Gary
Sent: Wednesday, March 28, 2018 10:52 AM
To: Sales, James <sales.james@epa.gov>
Subject: FJ Doyle Site

Jim:

What is the maximum depth of excavation that is required in the TSCA regulations or that you typically encounter with RP cleanups?

Thanks

Gary W. Moore (6SF-ER)
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